

Classification Appeal Decision
Under section 5112 of title 5, United States Code

Appellant: [appellant]

Agency classification: Quality Assurance Specialist
GS-1910-11

Organization: [Team]
[Division]
Defense Supply Center
Defense Logistics Agency
Department of Defense
[city and state]

OPM decision: Quality Assurance Specialist
GS-1910-11

OPM decision number: C-1910-11-06

/s/ Robert D. Hendler

Robert D. Hendler
Classification and Pay Claims
Program Manager
Center for Merit System Accountability

September 18, 2008

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a certificate which is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the *Introduction to the Position Classification Standards (Introduction)*, appendix 4, section G (address provided in appendix 4, section H).

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Introduction

On September 21, 2007, the Chicago Oversight and Accountability Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant]. His position is assigned to the [section] Team ([team]), Land Supplier Operations Directorate, Tactical Wheeled Vehicle (TWV) Division, Defense Supply Center [city and state] (DSCC), Defense Logistics Agency (DLA), Department of Defense (DoD), in [city and state]. The appellant's position is classified as Quality Assurance Specialist (QAS), GS-1910-11. However the appellant believes it should be classified at the GS-12 grade level. We received the initial agency administrative report on October 10, 2007, and the additional information needed to complete the agency administrative report (AAR), including the appellant's comments, on July 17, 2008. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

The appellant's position description (PD) and other material of record furnish much more information about the appellant's duties and responsibilities and how they are performed, and we incorporate it by reference into this decision. We conducted an initial telephone audit with the appellant on February 27, 2008, with several follow-up calls, particularly on July 25, 2008, to address his rationale concerning work flow issues. We also conducted a telephone interview with the immediate supervisor on March 28, 2008, with several follow-up calls to clarify and verify information developed during our fact-finding process. In reaching our classification decision, we carefully considered all of the information gained from these interviews, as well as all other information of record furnished by the appellant and his agency, including the PD of record.

Background

In July 2002, DLA entered into the first phase of the concept demonstration phase of its agency-wide reorganization called Business Systems Modernization (BSM). In implementing BSM, DLA established a standardized organizational structure throughout its three Defense Supply Centers (DSCs) and the Defense Distribution Center in New Cumberland, Pennsylvania. The BSM initiative resulted in an agency-wide reorganization. Under that reorganization, the duties of the GS-1670, Equipment Specialist, and the GS-1910, Quality Assurance Specialist, were combined to create a mixed series standard position description (SPD) ([# #####]) to reflect the new work process. A group of DSCC employees assigned to SPD [#####] in July 2002 and occupying identical additional (IA) positions, subsequently filed a classification appeal with OPM. OPM appeal decision C-1910-11-02, issued January 11, 2005, found the position to be properly classified as a Quality Assurance Specialist, GS-1910-11.

General issues

The appellant was not a member of the original group of appellants, but is assigned to the same SPD # [#####]. He believes the grade levels for QASs within DSCC are not consistent and refers to six other QAS positions that, since the issuance of the original appeal decision, have been upgraded to the GS-12 level.

In his appeal request, the appellant states that the agency asked its unions and employees to allow the agency to work out and implement its plans and in doing so not to judge any particular part of BSM until after the fully operational capable (FOC) date of September 1, 2006. The appellant believed that, having worked more than six months beyond the FOC date, his PD was not accurate in detailing the duties he performed, so he submitted a revised PD to his first-level supervisor for consideration to correct the alleged inaccuracies in its content. As a result, the appellant was informed by memorandum, signed by the Chief of Vehicle Support in IST, and dated June 11, 2007, that none of the revisions the appellant requested represented substantive change in the major duties. The classification of the SPD remained QAS, GS-1910-11.

The appellant then appealed the agency's decision to OPM; and we accepted this classification appeal under 5 CFR 511.607(a)(1), based on evidence that the appellant had made a reasonable attempt to obtain an accurate PD. In his original request, which we received on September 7, 2007, the appellant bases his appeal on the "accretion of duties" and other changes he believes his position has undergone since the transformation to BSM became FOC at DSCC on September 1, 2006. The appellant further states that his present SPD does not fully describe the IST work flow involved in providing support to the TWV Division; i.e., the PD lacks sufficient detail.

The *Introduction* and the *Classifier's Handbook* contain General Schedule classification principles and practices applicable to all positions classified under the provisions of chapter 51 of 5 U.S.C. As discussed in the *Classifier's Handbook*, OPM considers a PD adequate for classification purposes when it is considered so by one knowledgeable of the occupational field involved and of the application of pertinent position classification standards (PCS), principles, and policies; and supplemented by otherwise accurate, available, and current information on the organization, functions, programs, and procedures concerned. The *Introduction* also states that for nonsupervisory positions, the PD should define clearly the major duties assigned and the nature and extent of responsibility for carrying out those duties.

We find the major duties included in the draft PD the appellant submitted for the appeal were nearly identical to those already described in the SPD of record, absent the appellant's inclusion of words and phrases from one of the PDs he provided for comparison. The draft PD does not add any additional major duties not already described in the body of the SPD; and, therefore, we find the SPD of record adequate for classification purposes. Furthermore, a PD is the official record of the major duties and responsibilities assigned to a position by an official with the authority to assign work. Classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the duties assigned by management and performed by the employee. OPM classifies a real operating position and not simply the PD. Therefore, this decision is based on the actual duties assigned by management and performed by the appellant.

Implicit in the appellant's rationale is a concern that his position is classified inconsistently with other positions, since he refers to positions in other DSCC offices that perform similar work but are classified at a higher grade level. The appellant states that a number of QASs have been promoted to the GS-12 level for their work related to parts testing, and other QASs have been promoted to the GS-12 level who perform audit work to ensure the Government is being charged

properly. The appellant provided a copy of the GS-301-12, Kitting Operational Specialist, PD. Upon review, we find the kitting duties are addressed in his SPD, but not in the same detail as they are described in the draft PD he provided. In addition, the appellant also believes that some of the GS-1670 series duties of higher graded Product Specialist positions have been “returned” and now performed by him.

In adjudicating this appeal, our responsibility is to make our own independent decision on the proper classification of the appellant’s position. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant’s position to others which may or may not have been properly classified as a basis for deciding his appeal. Therefore, we have considered the appellant’s statements only insofar as they are relevant to making that comparison.

Like OPM, the appellant’s agency must classify positions based on comparison to OPM standards and guidelines. However, the agency also has primary responsibility for ensuring its positions are classified consistently with OPM appeal decisions. If the appellant considers his position so similar to others that they all warrant the same classification, he may pursue the matter in writing with his headquarters HR office. In doing so, he should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same as his, the agency must correct its classification to be consistent with this appeal decision. Otherwise, the agency should explain to him the differences between his position and the others.

The appellant makes various other statements about his agency and its evaluation of his position. Because our decision sets aside all previous agency decisions, the appellant’s concerns regarding his agency’s classification review process are not germane to this decision.

The authority in 5 U.S.C. 5112(b) is narrow and limited to adjudication of classification appeals. Section 5112(b) does not include any authority to direct DLA to curtail its use of “accretion promotions” or otherwise instruct DLA “to adhere to Personnel Laws, Regulations, and Guidelines....” Thus, we will not consider or respond to these or any of the appellant’s other requests unrelated to classification appeals process.

Position information

The appellant serves as a QAS assigned to IST in the TWV Division at DSCC which, under DoD requirements, oversees logistics operations necessary to accomplish its mission of providing centrally managed items of supply in support of worldwide needs of the military services. The buying command at DSCC sets the technical criteria for spare parts, and they all must be integrated into the existing systems. Any changes in a manufacturing process must be approved by the responsible program office within the buying command.

The duties of the position require the appellant to perform QA functions and provide pre- and post-award quality assurance support to acquisition specialists, engineering support activities, military services and other DLA customers. The appellant is responsible for multiple areas of

analysis, testing, and evaluation including quality assurance and general technical information related to items managed by DLA. The appellant provides contract evaluation of contractor performance and establishes standard/special inspection requirements. He addresses product related complaints.

Series, title, and standard determination

In response to an OPM certificate issued on the SPD for the IA position occupied by the appellant's coworkers, the agency amended the SPD by pen and ink changes and assigned the appellant's position to the Quality Assurance Series, GS-1910. The appellant does not disagree, and after careful review of the record, we concur. Furthermore, the position is subject to Defense Acquisition Workforce Improvement Act (DAWIA) certification, and the appellant possesses a current DAWIA certification for quality assurance work.

The Quality Assurance Series, GS-1910, covers positions which are primarily concerned with the systematic prevention of defects and non-conformances, the identification of unsatisfactory trends and conditions, and the correction of factors which may contribute to defective items. The duties of these positions require analytical ability combined with knowledge and application of assurance principles and techniques and knowledge of pertinent product characteristics and the associated manufacturing processes and techniques.

In his response to the AAR which we received on October 29, 2007, the appellant disagreed with the agency's continued use of the organization title of Product Specialist for the mixed position. He repeatedly makes use of the title of Product Assurance Specialist (PAS) in the body of the draft PD to support his point of the importance of the acquisition certification of the position required by DAWIA which he submitted to support his appeal rationale.

The approved basic title for all nonsupervisory positions in the GS-1910 series is Quality Assurance Specialist. Product Assurance is not among the authorized specializations identified in the PCS. This does not preclude the agency's use of organizational titles, in this instance, Product Assurance Specialist, for internal administration, program management, or similar purposes. Organizational titles are not appealable [see 5 CFR 511.607(a)(4)]. The use of a parenthetical title for incumbents who specialize in a functional area is usually left to the agency's discretion, however, since none of the major duties performed by the appellant are reflected by any of the authorized parenthetical specialization designations described in the titling section of the GS-1910 PCS, we find the use of a parenthetical title to be inappropriate. The published GS-1910 PCS must be used for grade-level determination.

Grade determination

The published GS-1910 PCS, which must be used for grade-level determination, is a threshold PCS and is written in the Factor Evaluation System (FES) format. Positions graded under the FES format are compared to nine factors. Levels are assigned for each factor and the points associated with the assigned levels are totaled and converted to a grade level. Under the FES, each factor-level description in a PCS describes the minimum characteristics needed to receive credit for the described level. Therefore, if a position fails to fully meet the criteria in a factor-

level description in any significant aspect, it must be credited at a lower level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level.

The agency assigned Levels 1-7, 2-4, 3-3, 4-4, 5-3, 6-3, 7-3, 8-1, and 9-1. The appellant agrees with the agency's crediting evaluation except for Factors 3, 5, and 6. After a thorough review of the record, we concur with the agency's evaluation of the uncontested factors. Therefore, our evaluation will focus on Factors 3, 5, and 6. However, since the appellant disagrees with the agency's evaluation of Factor 6, Personal contacts, we will also look at Factor 7, Purpose of contacts, because the relationship of Factors 6 and 7 presumes that the same contacts will be evaluated for both factors. Our evaluation with respect to those factors follows:

Factor 3, Guidelines

This factor covers the nature and extent of guidelines for performing the work and the judgment needed to apply the guidelines or develop new guidelines. Guidelines either provide reference data or impose certain constraints on the use of knowledge.

The appellant states "most goals and guidelines are general and must be refined into workable units...." The appellant's first line supervisor addressed the content of this factor in an electronic mail message in tab 8 of the appeal file. In it she supports modification of the language in this factor. She stated that the appellant is required to search multiple places for appropriate policy, job aids, procedural updates or specific functional "work arounds" in order to properly perform required tasks. She adds that this includes maintaining copies of emails providing corrections/updates that have not been incorporated into policy or available job aid.

At Level 3-3, the QAS has the responsibility to adapt and extend agency procedural guides and regulations to situations encountered in planning and accomplishing the work. While agency procedural guidelines are available, they may not be completely applicable to a particular assignment or provide specific guidance due to situations that may arise during the course of the work. Specialists must exercise judgment in interpreting general agency guides, regulations, or precedent cases and in adapting this guidance to individual situations and problems arising in the work. At this level, some positions may have responsibility for preparing operating instructions applicable to the local organization, plant or activity.

At Level 3-4, the principal guidelines regularly used in the work include agency quality assurance policy statements and program directives, Government procurement regulations and general administrative instructions. Guidelines are presented in general terms and frequently outline the major areas of program planning along with suggested approaches. For example, the guides may delineate major areas of concern and assign broadly-stated responsibilities for these activities during the development of quality assurance program plans. Development of the detailed approach and methodology is left to the specialist. The specialist uses initiative, extensive experience and a broad knowledge of quality assurance principles and practices to develop new methods and recommend policy changes. Through review of study reports, industry specifications/standards, and textbooks, keeps abreast of new developments having potential application to assigned programs.

The appellant's position meets Level 3-3. As described at Level 3-3, the appellant uses a variety of guidelines in the performance of assigned duties. These guides include but are not limited to agency instructions, policies, technical publications, contract quality assurance requirements and manufacturer's catalogs. Like Level 3-3, the appellant exercises seasoned judgment to modify his approach when guides are not completely applicable to the issue at hand. He interprets technical requirements and recommends approval or rejection of contractor's proposed manufacturing processes or alternate material requests. The appellant's searching multiple places for appropriate policy, job aids, procedural updates or specific functional "work arounds" in order to properly perform his work matches the extension and interpretation of guidelines typical of Level 3-3. The appellant has guidelines available which are of greater specificity than those found at Level 3-4.

We note section 1.1.3, Provides Additional Technical Support, of the PD of record states the appellant may represent the organization at meetings with industry representatives to develop and revise national standards and specifications. This section lists a series of duties which occupy 10 percent of the appellant's work time. As stated in the *Introduction*, some positions involve performing different kinds and levels of work which, when separately evaluated in terms of duties, responsibilities, and qualifications required, are at different grade levels. In most instances, the highest level work assigned to and performed by the employee for the majority of time is grade-determining. However, when the highest level of work is a smaller portion of the job, it may be grade-controlling only if the work is officially assigned to the position on a regular and continuing basis, it is a significant and substantial part of the overall position (i.e., occupying at least 25 percent of the employee's time), and the higher level knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant. Thus, the potentially higher graded functions listed in section 1.1.3 do not occupy a sufficient portion of the appellant's work time to control the level credited for this factor or the grade of the position as a whole.

Level 3-3 is credited for 275 points

Factor 5, Scope and effect

This factor covers the relationship between the purpose, breadth, and depth of the assignment and considers the impact of the work products or services both within and outside the organization.

The appellant states the purpose of his work is to effectively execute assigned technical and quality programs throughout the agency. He adds that this involves assigning appropriate plans to ensure technical research and selection of materials, production methods, quality control, and acceptance of contract for repair parts for DoD weapons systems for other Government agency requirements. Further, he states QASs make decisions on conformance/non-conformance, reclamation, repair, and disposal for Government property affecting inventory and service levels. The work performed facilitates production, design, procurement, and manufacturing throughout the agency and affects efficiency and productivity of other agency employees by both throughput and technical advice. The work results affect many levels including program management across the agency.

At Level 5-3, the work involves performance of a variety of assignments directed toward ensuring acceptability of products, or acceptable levels of quality in the operations involved. Most problems encountered in the assignments can be dealt with by the selection and/or adaptation of formal work methods and procedures; i.e., established criteria and general operating procedures have been developed covering the nature and scope of quality assurance activities to be accomplished. The results of the work affect the acceptability of the products involved in terms of conformance to technical requirements; meeting user's needs in a timely fashion, and performing as intended. For some positions, the results of the work impact effectiveness of operations in achieving and maintaining desired quality levels consistent with economy and efficiency. In other work situations, decisions on acceptability of products may impact the financial posture of manufacturers.

At Level 5-4, the purpose of the work is to plan, develop, and implement quality assurance projects of considerable breadth and complexity. Some assignments at this level may involve responsibility for planning and implementing program plans for ensuring that quality requirements for major products are achieved throughout the item's life cycle. Other assignments may involve serving as a technical specialist in a broad product or commodity area or be concerned with quality implications of highly specialized products, manufacturing processes, and techniques for a range of agency activities. Still other assignments may involve staff responsibilities in various quality assurance program activities. At Level 5-4, the results of the work affect a range of agency activities being carried out at a number of locations. For example, projects concerned with quality planning throughout a product's life cycle affect agency programs in areas such as maintenance, supply, or storage as well as those activities in the development and production phases. Similarly, the services provided by technical specialists for a product or commodity typically have application to other agency programs and activities.

The agency evaluation states the QAS is not vested with direct responsibility for agency wide QA functions, for developing and approving test plans, and for providing support across supply chains. Typical of Level 5-3, the appellant provides technical/quality expertise, determines and initiates necessary product testing, and inspection. As an authority for items managed by DLA, the appellant participates in the vendor evaluation process and functions as an expert liaison for personnel throughout the agency to include those in the procurement process. The appellant recommends or specifies the appropriate levels of quality control for inclusion in contracts. Most problems encountered in the assignments can be dealt with by the selection and/or adaptation of formal work methods and procedures. The appellant serves as the DoD point of contact for the proper demilitarized (DEMIL) codes of assigned products and for the technical instruction on the process needed for compliance. The appellant addresses product issues when they arise from customers or Defense Distribution Centers. The first-level supervisor confirmed that the appellant has the authority to dispose of thousands of dollars of stock without prior approval. Like Level 5-3, where the results of the work affect the acceptability of the products involved in terms of conformance to technical requirements and meeting end users' need, the appellant's decision-making investigatory and multi-functional capabilities can have major affect on stock readiness and overall customer satisfaction. Unlike Level 5-4, the appellant's work assignment is item-oriented. He is not responsible for the major systems or commodity areas found at Level 5-4.

Level 5-3 is credited for 150 points.

Factor 6, Personal contacts

This factor covers the type and level of contacts made in carrying out the work. This factor includes face-to-face and telephone contacts and other dialogue with persons not in the supervisory chain essential for successful performance of the work and which have a demonstrable impact on the difficulty and responsibility of the work performed. It considers what is required to make the initial contact, the level of difficulty of communicating with those contacted, and the setting in which the contact takes place, e.g., the degree to which the employee and those contacted recognize their relative roles and authorities. The standard instructs that the same contacts will be evaluated for both Factors 6 and 7.

The appellant states the role of the QAS has always been to communicate and resolve the technical and quality questions across the logistics chain. He adds that conventional thinking never took into account that the agency's supplier's are mostly small to medium companies which rely heavily on the QAS' building of consensus for the agency with the presidents, vice presidents, engineers and relating to command and staff at flag rank and below.

At Level 6-3, regular contacts extend to employees and officials of other Federal agencies and/or private industry. The individuals contacted vary according to the situation and require that the specialist ensure the persons involved understand their respective roles. Personal contacts with quality assurance and program officials across agency lines (e.g., where one agency is tasked to perform procurement quality functions on another agency's contracts) frequently require that the specialist identify, locate, the appropriate person(s) to establish working relationships.

At Level 6-4, contacts are with high-level program and QA officials in other Federal agencies, top executives of large private industrial firms, or representatives of foreign governments. The nature of the contacts presents special problems that require the specialist to ensure that officials contacted have the responsibility and authority to resolve the issues in question. Level 6-4 describes the highest level of personal contacts found in the Federal service. Characteristically, they occur in highly unstructured settings where the officials may be relatively inaccessible; arrangements may have to be made for accompanying staff members; appointments may have to be made well in advance; each party may be very unclear as to the role and authority of the other; and each contact may be conducted under different ground rules.

The appellant believes that he should be credited at Level 6-4. While the appellant uses language identical to Level 6-4 in the PCS, this language conflicts with his rationale describing that his primary contacts are with small- to medium-sized companies. These contacts are typical of Level 6-3 as described previously. Level 6-4 is not met where contacts with high level program and quality assurance officials in other Federal agencies, top executives of **large** private industrial firms, or representatives of foreign governments are regular and recurring.

Level 6-3 is credited for 60 points.

Factor 7, Purpose of contacts

This factor covers the reasons for the contacts identified under Factor 6. The purpose of contacts ranges from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, goals, or objectives. The personal contacts, which serve as the basis for the level selected for this factor, must be the same as the contacts identified under Factor 6.

Similar to Level 7-3, the purpose of the appellants' contacts outside the agency is to negotiate and settle significant quality issues and problems with management representatives. The appellants' contacts involve the explanation of quality requirements to contractors and others who may not readily accept the requirements.

Unlike Level 7-4, the purpose of the appellants' contacts with those outside their agency does not include the resolution of issues or problems of such significance that they must lead to a special study project or interagency working group to achieve a common understanding of the root causes and to develop acceptable alternatives. This authority is retained by higher echelon officials, including the buying command which sets the technical criteria to insure they are integrated into the existing systems.

Level 7-3 is credited for 120 points.

Summary

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge Required by the Position	1-7	1250
2. Supervisory Controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and Effect	5-3	150
6. Personal Contacts	6-3	60
7. Purpose of Contacts	7-3	120
8. Physical Demands	8-1	5
9. Work Environment	9-1	<u>5</u>
<i>Total</i>		2540

A total of 2,540 points falls within the GS-11 range (2,355 to 2,750) on the JFS's grade conversion table.

Decision

The position is properly classified as Quality Assurance Specialist, GS-1910-11.